

Sunethra Muralidhara, Esq.
Nevada State Bar No. 13549
WRIGHT MARSH & LEVY
300 S. Fourth Street, Suite 701
Las Vegas, NV 89101
Phone: (702) 382-4004
Fax: (702) 382-4800
Email: smuralidhara@wmllawlv.com

Attorney for Dr. Maninder Herr

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

Dr. Maninder Herr,

Defendant.

Case No. 2:24-cv-01724-JCM-DJA

**Stipulation to Extend Time to Answer
or Otherwise Plead**

(Second Request)

Plaintiff, United States of America, by and through United States Attorney, Jason M. Frierson, and Assistant United States Attorney, Reem Blaik; and Defendant Dr. Maninder Herr, by and through his counsel of record, Sunethra Muralidhara Esq., of Wright Marsh & Levy, hereby stipulate and agree that the Defendant's deadline to answer or otherwise respond to Plaintiff's Complaint, currently due December 30, 2024, **should be extended 45 days until February 13, 2025**. This extension is sought for the following reasons:

1. A complaint was filed on or about September 16, 2024. ECF 1.
2. Counsel was retained by defendant on or about October 15, 2024. Counsel has been diligently reviewing case materials and getting up to speed on the current status of the case as well as conducting her own investigation. On October 18, 2024, counsel

accepted service of the Complaint and acknowledged the initial due date to Answer of November 29, 2024.

3. A stipulation to extend time to answer or otherwise plead (first request) was filed on November 27, 2024. ECF 5. It was granted by this Court. ECF 6.

4. The parties are still in process of good faith negotiations and require additional time to discuss potential resolution short of litigation. The defense is also continuing to investigate the alleged violations.

5. This request is not sought for purposes of delay and made in good faith. This is the parties' second request for a continuance.

Dated: December 23, 2024.

WRIGHT MARSH & LEVY

JASON M. FRIERSON
UNITED STATES ATTORNEY

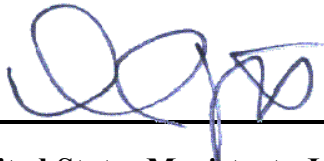
By: /s/ Sunethra Muralidhara

Sunethra Muralidhara, Esq.
Counsel for Defendant Herr

By: /s/ Reem Blaik

REEM BLAIK
Assistant United States Attorney

IT IS SO ORDERED:



United States Magistrate Judge

Dated: 12/30/2024